



25

Charles J. Rehwinkel
General Attorney

PO Box 2214
Tallahassee, FL 32310
Mailstop 117760010
Voice 850-547-0111
Fax 850-597-1115

January 15, 1998

BY HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No. ~~990001TT~~

Dear Ms. Bayo:

Enclosed for filing is the original and fifteen (15) copies of Sprint-Florida, Incorporated's Direct Testimony of Dwane Arnold in the above referenced docket.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,

✓

Charles J. Rehwinkel
Attorney

2
2

cc: Parties of Record

Enclosures

5

DOCUMENT NUMBER-DATE

FPSC-RECORDS/REPORTING

44
56

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

REBUTTAL TESTIMONY

OF

DWANE R. ARNOLD

1
2
3
4
5
6 **Q. Please state your name and business address.**

7
8 **A. My name is Dwane R. Arnold. My business address is 4220**
9 **Shawnee Mission Parkway, Fairway, Kansas, 66215.**

10
11 **Q. By whom are you employed and what is your current**
12 **position?**

13
14 **A. I am employed by Sprint Corporation as Manager -**
15 **Regulatory Policy for Sprint's Local Telecommunications**
16 **(ILEC) Division.**

17
18 **Q. Please describe your educational background and work**
19 **experience.**

20
21 **A. In 1986, I received a Bachelor of Science degree in**
22 **Accounting from Mid-America Nazarene University and in**
23 **1989 I received a Master of Science degree in Accounting**
24 **from the University of Missouri, Kansas City. I have**
25 **been employed by Sprint since 1990 where I held various**

DOCUMENT NUMBER-DATE

00882 JAN 15 8

EPSC-RECORDS/REPORTING

1 positions in the area of Billing and Collection product
2 management and contract negotiation for both Sprint's
3 Long Distance and Local (ILEC) Divisions.
4

5 Q. What is the purpose of your testimony?
6

7 A. The purpose of my testimony is to respond to direct
8 testimony previously filed by various parties regarding
9 proposed changes in the Florida Public Service
10 Commission's (Commission) rules in Docket Number 970882-
11 TI, on behalf of Sprint-Florida, Inc., I am also
12 preliminarily responding to the proposals contained in
13 the December 24, 1997 Notice of Rulemaking.
14 Specifically, I state Sprint's support for certain of the
15 rule proposals in this docket. I also provide reasons
16 why Sprint believes certain other proposed solutions are
17 not feasible or cost effective in the effort to prevent
18 slamming and offer alternatives where possible. Because
19 this Commission has proposed significant changes to the
20 rules at a late stage in the rulemaking and Sprint is
21 still in the process of evaluating the technical
22 feasibility and costs, it may be necessary to file
23 supplemental testimony or comments.
24

25 Q. Please explain the reason for separate testimony from

1 Sprint Communications Company Limited Partnership and
2 from Sprint-Florida.

3
4 A. Direct and rebuttal testimony provided on behalf of
5 Sprint Communications Company Limited Partnership and/or
6 Sprint-Florida, Inc. represents the position of Sprint
7 Corporation. Due to the fact this specific docket
8 pertains to issues that are, in many cases, unique to the
9 expertise and operating conditions of Sprint's Long
10 Distance Division (Sprint Communications Limited
11 Partnership) or to Sprint's Local Telecommunications
12 Division (ILEC) it was necessary and of added value to
13 provide testimony from both perspectives. While separate
14 testimony is being submitted in this docket, it should be
15 noted that the testimony in total is consistent with the
16 overall position of Sprint Corporation. Even so, each
17 division maintains separate "party" status in this
18 docket. In the remainder of my testimony, "Sprint"
19 refers to Sprint's ILEC operations in Florida, Sprint-
20 Florida, Inc.

21
22 Q. Please summarize Sprint's position.

23
24 A. Sprint requests that the Commission not issue a
25 rulemaking in this matter until the FCC issues its

1 revised slamming rules order in CC Docket No. 94-129.
2 However, if the Commission should decide to adopt new
3 slamming rules prior to the FCC rulemaking, the
4 Commission should consider that to the extent that
5 special additional and/or unique requirements are
6 implemented in Florida, those requirements will be a
7 factor which even responsible, viable and law-abiding
8 potential new entrants must include in deciding whether
9 or not they will compete in the Florida market.

10
11 If the Commission does adopt rules in this docket, Sprint
12 proposes that it take the following actions to address
13 the slamming and cramming problems.

14
15 First, the PIC change requirements in the proposed rule
16 25-4.118 should be implemented, except for the
17 requirement that customer signed post card be returned
18 and the requirement for inbound call verification.
19 Implementing this section of the proposed rule, which
20 places more stringent requirements on service providers
21 before PIC changes can be implemented, and eliminating
22 the use of deceptive and/or incentive LOAs, should help
23 mitigate slamming problems.

24
25 Second, regulatory and law enforcement agencies should

1 initiate aggressive prosecution of any provider using
2 deceptive and/or fraudulent methods for switching
3 customer's service providers or cramming.

4
5 Third, providers and the Commission should initiate
6 consumer education programs on these slamming and
7 cramming issues.

8
9 A fourth action should be taken only if the Commission
10 lawfully concludes that the bill block option/PIN number
11 measure is viable. If so, any rule adopted should give
12 a service provider an opportunity to demonstrate
13 implementation of internal mechanisms that effectively
14 reduce cramming complaints prior to the Commission
15 requiring costly implementation of the bill block option
16 or PIN mechanism.

17
18 The above actions should significantly reduce slamming
19 problems and avoid some of the more burdensome and costly
20 proposals that will ultimately increase costs to
21 consumers and result in processes and procedures which
22 could discourage competitors from marketing their
23 services in Florida.

24
25 Thus, while Sprint supports the Commission's efforts to

1 eliminate slamming, Sprint proposes that not all the
2 proposed rule changes be implemented immediately if at
3 all. Second, since many of the proposed rule changes
4 were just recently distributed, there has not been
5 adequate time or information provided for determining
6 technical specifications, capabilities and costs. As the
7 Commission must recognize, many of the recently proposed
8 rule changes will, if implemented, result in significant
9 system and operational impacts to LECs, ALECs and IXCs
10 which will take significant time to implement.

11
12 As the Commission continues to analyze the causes for
13 slamming and proceeds with rulemaking in light of the
14 testimony by the parties of record, Sprint requests that
15 the Commission only adopt the proposals supported by
16 Sprint until the results of implementing those proposals
17 on the slamming problems have been determined. If after
18 determining the effectiveness of those rule changes,
19 additional requirements are still deemed necessary, more
20 detailed proposals can be developed and cost/benefit
21 analyses completed. To ensure that any additional
22 proposals are technically feasible and cost effective,
23 the Staff should conduct workshops to better define
24 system requirements and technical capabilities. Without
25 such analysis there is significant risk of implementing

1 high-cost solutions that may result in very little if any
2 benefit and that could potentially result in
3 unanticipated negative side-effects (e.g., frustrate the
4 Commission's efforts to foster competition).
5

6 Q. What are the primary reasons for slamming complaints?
7

8 A. A significant percentage of all slamming complaints
9 result from subscribers (or family members of the
10 subscriber) signing inducements which are misleading
11 and/or deceptive. Others are the result of human error,
12 unscrupulous marketing agents, buyer's remorse or an
13 allegedly improper decision maker.
14

15 Q. Will the proposals you support address these slamming
16 complaint issues?
17

18 A. Yes. Swift and aggressive prosecution of unscrupulous
19 companies would be an effective deterrent. It should
20 also be a primary objective to prosecute the offenders
21 rather than penalizing the other industry service
22 providers by requiring them to incur additional costs
23 that will flow through to their customers.
24

25 Elimination of deceptive LOAs and the revised LOA

1 requirements in the proposed rule would address the other
2 slamming complaint issues. Effective PIC change
3 verification will allow companies and regulators to sort
4 out valid slamming complaints as well to assess
5 liability.

6
7 Q. In the direct testimony of Earl Poucher on behalf of the
8 Attorney General and Public Counsel, and J. Alan Taylor
9 on behalf of the Commission staff, there are arguments in
10 favor of the proposed bill blocking option that would be
11 offered by the LECs free of charge to customers upon
12 request. According to the direct testimony, this bill
13 block would prevent unauthorized charges (cramming) from
14 appearing on the end user's bill. What is Sprint's
15 position on this issue?

16
17 A. Cramming is a serious problem that needs to be fixed.
18 However, Sprint has serious concerns with the
19 Commission's proposed rule that LECs should be required
20 to implement a billing block option to our subscribers
21 with a personal identification number required to
22 override the block. First, it is not clear that such an
23 option is technically possible or if technically possible
24 what such a system would cost. Before such a process
25 could be implemented the process would need to be well

1 defined before technological capabilities and associated
2 cost could be determined. For instance, would the
3 consumer be required to provide the PIN number before a
4 call can be completed or charge generated (similar to
5 LIDB functionality)? Or would the consumer call the LEC
6 after a charge has been generated and upon provision of
7 the PIN number the LEC would then allow the charge to be
8 billed (i.e on a "per charge" basis)? Also, once an
9 unscrupulous provider gets a PIN for a valid charge, what
10 would keep the provider from using the PIN for invalid
11 charges? These and many other technical and operational
12 issues need to be identified before a process can be
13 developed and the associated cost determined. There may
14 be instances where valid telecommunication charges are
15 generated by a consumer and those charges are billed
16 through the LEC; however, the consumer may not realize
17 the charge will be LEC billed and therefore not provide
18 a PIN. The result of such a situation could be large
19 volumes of unbillable valid charges that the LEC would
20 recourse back to the service provider. Also, as the
21 public becomes aware of the bill blocking option, there
22 will be a segment of the public who will take advantage
23 of the potential fraud opportunity unless there is an
24 effective up-front method of preventing charges in the
25 first place. Conceptually a PIN number process without

1 bill blocking could provide such a mechanism. However,
2 at this time Sprint has not had adequate time to say
3 whether a PIN number mechanism alone would be practical
4 in operation or even technically feasible.

5
6 Depending upon the specific requirements, the
7 implementation of the bill block option would potentially
8 require development of industry standards for the
9 exchange of billing/charge information and network
10 functionality to accept a PIN before completing the call.
11 While Sprint cannot accurately project the cost for
12 Sprint LTD to implement the billing block option without
13 detailed technical standards, it is preliminarily
14 estimated the total cost would be at least \$600,000 which
15 does not include the cost of upgrading switching software
16 and operator service platforms to allow a PIN number to
17 be used. If there is a need for developing industry
18 standards, the time required to develop such
19 functionality could be one or two years before such an
20 option would be available to end users. Sprint has not
21 had sufficient time to evaluate any need to have
22 industry-wide standards.

23
24 In addition to the cost factors, the billing block option
25 could be very confusing to end users. It seems the

1 consumer may find it difficult to remember when the PIN
2 is required or, unless the PIN is required at the point
3 of call or charge generation, the LEC could be put in the
4 position of calling the consumer every time a charge
5 comes through for billing and rejects because the
6 customer did not provide notification of the PIN
7 authorizing the charges.

8
9 This proposed rule presents an opportunity for fraud that
10 would create an operational and regulatory nightmare
11 worse than the slamming issue itself. Over the past
12 several years the telecommunications industry has
13 experienced the creative methods people have used to
14 commit fraud and there is the real potential that these
15 PIN numbers could be the latest loophole resulting in
16 significant levels of fraud. For example, there is the
17 opportunity for a person to incur a charge and then
18 immediately call the LEC to order bill blocking or simply
19 change the PIN number, thereby preventing the charge from
20 ever being billed. The Commission needs to consider
21 potential problems associated with real-time PIN
22 activation/deactivation and billing lag. It may also
23 create a "black market" for PIN numbers to be bought and
24 sold similar to the way calling card numbers are
25 fraudulently used today. Also, once a company has the

1 consumer's PIN number, there is nothing that would
2 prevent that company from using the PIN number without
3 the consumer's authorization. In addition, this process
4 will not prevent the use of the PIN number by
5 unauthorized or non-decision makers within a family.
6 There could also be a significant level of complaints
7 developed because of disputes over whether or not the
8 customer actually provided the PIN number.

9
10
11 The bottom line on the bill blocking option in Sprint's
12 opinion is that it appears to be an extremely high-cost
13 proposal, that will result in higher charges to
14 customers, increase customer confusion, result in
15 additional fraud opportunities, and may not significantly
16 reduce the cramming problem. The Commission must have
17 convincing, competent evidence that the bill block option
18 is technically feasible, and, if so, that it will be
19 effective given the cost of implementation before
20 adopting such a requirement.

21
22 Q. Would Sprint like to recommend an alternative solution?

23
24 A. Yes. The Commission should first consider company
25 safeguards before requiring mandatory offering of bill

1 blocking. Before Sprint enters into a Billing and
2 Collection (B&C) contract with any IXC or clearinghouse,
3 we have attempted to exercise care to scrutinize the
4 services or programs being billed by the IXC or companies
5 served by the clearinghouse in an effort to ensure the
6 consumer is receiving and being billed for valid,
7 beneficial services. In 1997, Sprint denied seven
8 companies from billing charges on the LEC bill in Florida
9 because, in Sprint's opinion, the program contained
10 misleading information and/or the charges were likely to
11 result in a high number of customer complaints. In
12 addition, for those companies with existing B&C contracts
13 with Sprint, we have implemented a process whereby
14 customer complaints regarding unauthorized charges are
15 monitored and when the number of complaints for a
16 particular company reaches a certain low threshold, the
17 IXC or clearinghouse is contacted immediately to resolve
18 the issue. Generally, Sprint will begin taking action
19 when more than 15 or 20 similar complaints are received
20 regarding a company submitting alleged unauthorized
21 charges. If a viable corrective action plan is not
22 implemented within a reasonable time frame, Sprint blocks
23 all future billing from the specific company that is
24 submitting charges through a clearinghouse to Sprint. In
25 the event a clearinghouse continues to submit bills for

1 **companies that submit unauthorized charges, Sprint has**
2 **the authority by contract to cancel the B&C agreement**
3 **with that clearinghouse. In cases where there is**
4 **evidence that a company is submitting**
5 **unauthorized/fraudulent charges, Sprint immediately stops**
6 **billing for those charges and then notifies the**
7 **clearinghouse after the fact. Sprint is very concerned**
8 **about how cramming negatively impacts its customers and**
9 **their perception of Sprint and is in the process of**
10 **developing even more stringent internal safeguards.**

11

12 **In addition to these internal safeguards, these**
13 **unscrupulous companies and their principals should be**
14 **criminally prosecuted. It is Sprint's opinion that**
15 **visible prosecution of one or two companies and their**
16 **principal(s) who fraudulently submit unauthorized charges**
17 **will deter future abuse of the LEC billing process and**
18 **the need for a billing block will be reduced. In any**
19 **event, Sprint is eager to cooperate with the FPSC,**
20 **Attorney General and/or law enforcement in this regard.**

21

22 **Q. In the event a consumer has been slammed, the proposed**
23 **rules state that charges for unauthorized provider**
24 **changes and all charges for the first 90 days or first**
25 **three billing cycles, whichever is longer, shall be**

1 credited by the company responsible for the error within
2 45 days of notification. What is Sprint's position on
3 this issue?
4

5 A. Sprint strongly opposes any rule that would relieve
6 customers who claim to have been slammed of the duty to
7 pay for any of the charges for calls or other services
8 that were actually incurred by the customer during the
9 time they were assigned to an unauthorized carrier. When
10 customers intentionally receive the use and benefit from
11 a service, they should be required to pay for the
12 services received at the rates of their previous carrier.
13 Any rule that absolves a customer of their financial
14 responsibility only provides incentives for bogus
15 slamming complaints and PIC disputes for the purpose of
16 obtaining free services, thereby increasing the number of
17 customer complaints. This would not only result in more
18 complaints but it would become increasingly difficult and
19 burdensome to distinguish between valid slamming
20 complaints and unfounded slamming complaints.

21
22 It is Sprint's position that the consumer be made whole
23 by the slamming carrier by adjusting charges incurred
24 during the time they were assigned to an unauthorized
25 carrier to the level of charge they would have received

1 if they had remained on the carrier of choice, if the
2 unauthorized carrier charges are higher.

3

4 Notwithstanding the above, in the event it has been
5 determined that a consumer has been billed for
6 unauthorized or fraudulently submitted charges on the LEC
7 bill, and the consumer does not get satisfactory
8 resolution from the provider of the service, Sprint has
9 in place today a process whereby, in cases where the
10 customer appears to have meritorious claims, we will
11 issue a credit to the end user for all charges involved
12 in the dispute and the charge will be recouped back to
13 the service provider.

14

15 By ensuring Sprint's business office personnel are
16 informed and trained on how to properly handle such
17 consumer complaints, we believe Sprint's current process
18 meets the intent of the Commission to ensure consumers
19 are not disconnected or put into the treatment and
20 collection process for not paying unauthorized charges.
21 This docket has brought to light a very limited number of
22 instances where the process has not worked as well as
23 desired. Sprint is making an effort to prevent a
24 recurrence of these rare occurrences. We do not believe
25 it is prudent to mandate that all charges be removed from

1 the consumer's bill when the consumer receives the
2 benefit of the service.

3

4 Q. Generally, the LECs and IXCs commenting so far contend
5 that the addition of the certificate number on the
6 customer bill identifying the provider of a billed
7 service and the type of service will add little if any
8 value to interpretation of customer bills or prevent
9 slamming. Would you like to comment on this issue?

10

11 A. Yes. It is Sprint's policy that (ILEC) bills currently
12 display the name of each service provider and
13 clearinghouse on separate bill pages for all charges to
14 an end user. When a charge is submitted by a
15 clearinghouse to Sprint for billing, the name of the
16 underlying service provider is included on the bill in
17 addition to the name of the clearinghouse. Sprint
18 includes its toll-free number on the local portion of the
19 bill and the toll-free number of each service provider
20 and/or clearinghouse whose charges appear on our LEC
21 bill. There are a limited number of service providers
22 and clearinghouses that have contracted with Sprint to
23 perform customer inquiry on their behalf. In these
24 circumstances Sprint places its own toll-free number on
25 the service provider's bill page.

1 Based upon Sprint's experience, we agree with those who
2 have testified that adding the certificate number and
3 type of service to the bill will provide little if any
4 value, while adding significant cost to the LECs. Sprint
5 has estimated that the non-recurring cost of adding the
6 certificate number to our LEC bill would be at least
7 \$610,000. Adding the type of service to the bill would
8 create additional recurring and non recurring cost which
9 Sprint estimates could exceed the cost of adding the
10 certificate number, depending on how the information
11 would be required to appear on the bill. The current
12 bill format provides customers with a description of
13 charges which, in almost all cases, provides the customer
14 with sufficient detail to determine the type of charge
15 being billed.

16
17 Sprint requests that the Commission not adopt the
18 requirement that the certificate number and type of
19 service to be displayed on the bill. However, if the
20 Commission determines that this information should be
21 included on the bill, the Commission should identify
22 specifically what the bill should look like and the
23 definitions of the various service categories. Then the
24 companies should be allowed adequate time to develop the
25 costs so that the Commission can make an informed

1 decision regarding the cost effectiveness of the proposed
2 change.

3
4 Q. In the direct testimony of both Jennifer Erdman-Bridges
5 and J. Alan Taylor, on behalf of staff, there are
6 comments in support of the Commission's proposed rule
7 that would require the customer to return a signed
8 postcard in the event PIC change verification occurred
9 via the welcome package option. Please provide Sprint's
10 reply to these comments.

11
12 A. As stated in the direct testimony of Sandee Buysse-Baker
13 on behalf of Sprint Communications, our experience with
14 the "Welcome Package" process would indicate that
15 implementation of this rule would result in customer
16 confusion and cause unnecessary delays in the PIC change
17 process resulting in customer dissatisfaction and make it
18 more difficult for competitive providers to enter the
19 market and win customers. In addition to the delay in
20 PIC changes created by the mailing process, Sprint
21 believes there would be a large percentage of consumers
22 (intending to change providers) who would not return the
23 postcard for various understandable reasons such as
24 forgetting to send the card or simply not realizing the
25 card must be returned to effect the PIC change. Sprint

1 recommends that the current postcard verification option
2 remain unchanged.

3

4 Q. BellSouth, in the direct testimony of Jerry Hendrix on
5 behalf of BellSouth Telecommunications, Inc., states that
6 it does not support the application of verification
7 procedures to customer initiated calls. What is Sprint's
8 position on this issue?

9

10 A. Sprint agrees with BellSouth. While the FCC originally
11 ruled that telecommunications providers are required to
12 verify sales made as a result of customer-initiated
13 inbound calls, it has subsequently stayed the requirement
14 in light of petitions for reconsideration by Sprint and
15 others pointing out that the imposition of a verification
16 requirement with respect to such calls would impose
17 significant costs to remedy what all available evidence
18 suggests is a non-existent problem. Sprint is convinced
19 verification of customer-initiated calls will impose
20 substantial costs on carriers but will fail to
21 effectively address the root causes of slamming. Again
22 these costs will flow to customers and may prevent other
23 service providers from entering the Florida market.

24

25 Q. In the testimony of Earl Poucher, on behalf of the

1 Commission staff, it is recommended that the commission
2 adopt a rule that requires LECs to reject all PIC change
3 requests that do not have an exact name, address and
4 telephone number match. Does Sprint have any information
5 on how successful this process would be?

6
7 A. Sprint understands the reasoning behind Mr. Poucher's
8 recommendation that the Commission should require LECs,
9 ALECs and IXCs to include the last name, address and
10 telephone number in the transmittal of PIC change
11 requests and that the LECs should be required to reject
12 orders when the carrier fails to provide information that
13 matches the records of the LEC. In fact, in 1993, Sprint
14 (ILEC) considered a similar approach to minimizing PIC
15 change errors by rejecting PIC changes that did not match
16 name and address. Due to the fact such a matching
17 process requires an exact match, Sprint experienced a
18 significant percentage (greater than 50%) of valid PIC
19 change orders that were rejecting, causing unnecessary
20 delays in the PIC change process and customer
21 dissatisfaction. While in theory this process should
22 minimize errors in the PIC change process, the practical
23 application of such a process is not feasible. For
24 example, how many of you can precisely state how your
25 ILEC name and address appears on your ILEC bill?

1 Q. BellSouth, in its direct testimony, provided proposed
2 wording changes for Section 25-4.118 Local, Local Toll or
3 Toll Provider Selection for the Commission to consider.
4 Does Sprint support the proposed wording?
5
6 A. Yes. If the Commission decides to implement new rules
7 prior to the FCC rulemaking on the slamming issue, then
8 BellSouth's proposed wording changes are consistent with
9 Sprint's position.
10
11 Q. Please summarize the main points of your testimony.
12
13 A. Sprint supports efforts to address the slamming and
14 cramming problems. As stated above, improved PIC change
15 verification and prohibiting deceptive LOAs will most
16 effectively address slamming issues in a competitive
17 environment.
18
19 Sprint opposes the proposals that would require an
20 unauthorized provider to remove all charges billed to an
21 end user for a specified period. While Sprint recognizes
22 the inconvenience the customer may experience in a true
23 case of slamming, in most cases the customer received
24 service or made calls for which they are legally required
25 to pay. Requiring providers to remove all charges for up

1 to 90 days would result in additional alleged slamming
2 complaints to get the 90 days of free service. This
3 would create a more onerous and burdensome process of
4 segregating the valid from the invalid slamming
5 complaints.

6
7 Sprint opposes the Commission proposal that would require
8 audio recording verification of inbound customer-
9 initiated calls. There is evidence that suggests very
10 few slamming complaints result from inbound customer-
11 initiated calls and that the cost of implementing such a
12 requirement would far outweigh the benefits.

13
14 Sprint also requests that the Commission refrain from
15 implementing any proposed billing system changes until
16 after implementing the measures supported by Sprint and
17 then analyzing the underlying causes for any slamming and
18 cramming complaints. Then, if still deemed necessary,
19 proposed solutions could be and defined, and a detailed
20 cost/benefit analysis completed.

21

22 Q. Does this conclude your testimony?

23

24 A. Yes, it does.

**CERTIFICATE OF SERVICE
DOCKET NO. 970882-TI**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail this 15th day of JANUARY, 1998 to the following:

Richard D. Nelson, Esq.
Hopping, Sams & Smith, P.A.
P. O. Box 6526
Tallahassee, Florida 32314

Michael J. Henry, Esq.
Martha P. McMillin, Esq.
MCI Telecommunications Corporation
780 Johnson Ferry Road, Suite 700
Atlanta, GA 30342

Diana Caldwell, Esq.
Florida Public Service Commission
Division of Appeals
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-7704

Ms. Beverly Y. Menard
GTE Florida Incorporated
106 East College Avenue, Suite 1440
Tallahassee, Florida 32301-1440

BellSouth Telecommunications, Inc.
Robert G. Beatty
Nancy B. White
c/o Nancy H. Sims
150 so. Monroe Street, Suite 400
Tallahassee, Florida 32301

Ms. Harriet Eudy
ALLTEL Florida, Inc.
P.O. Box 550
Live Oak, FL 32060-3343

Mr. Bill Thomas
Gulf Telephone Company
P.O. Box 1007
Port St. Joe, FL 32457-1007

Mr. Robert M. Post, Jr.
Indiantown Telephone System, Inc.
P.O. Box 277
Tallahassee, Florida 34956-0277

Andrew O. Isar
Director, Industry Relations
Telecommunications
Reseller Association
4312 92nd Avenue, N.W.
Gig Harbor, WA 98335-4461

Ms. Lynn G. Brewer
Northeast Florida Telephone
Company, Inc.
P.O. Box 485
Macclenny, Florida 32063-0485

Mr. Thomas McCabe
Quincy Telephone Company
P.O. Box 189
Quincy, Florida 32353-0189

Mr. John H. Vaughan
St. Joseph Telephone
& Telegraph Company
P.O. Box 220
Port St. Joe, Florida 32456-0220

Ms. Laurie A. Maffett
Frontier Communications
of the South, Inc.
180 S. Clinton Avenue
Rochester, N.Y. 14646-0400

Ms. Lynn B. Hall
Vista-United Telecommunications
P.O. Box 10180
Lake Buena Vista, Florida 32830-0180

Tracy Hatch
AT&T Communications of the
Southern States, Inc.
101 North Monroe Street
Tallahassee, Florida 32311

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs & Ervin
P. O. Drawer 1170
Tallahassee, Florida 32302

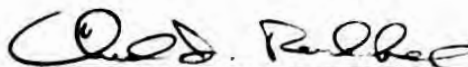
Michael A. Gross
Assistant Attorney General
Office of the Attorney General
PL-01 The Capitol
Tallahassee, FL 32399-1050

Carolyn Merek
VP of Regulatory Affairs
Southeast Region
Time Warner Communications
P. O. Box 210706
Nashville, TN 37221

Charles J. Beck
Deputy Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street Room 812
Tallahassee, FL 32399-1400

Anthony P. Gillman
Kimberly Caswell
GTE Florida Inc.
P. O. Box 11, FLTC0007
Tampa, FL 33601-0110

Peter M. Dunbar
Barbara D. Auger
Pennington, Moore, Wilkinson &
Dunbar, P.A.
P. O. Box 10095
Tallahassee, FL 32302



Charles J. Rehwinkel
Attorney for
Sprint-Florida, Inc.
P.O. Box 2214 MC FLTLHO0107
Tallahassee, FL 32316-2214
904/847-0244